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June 25, 2020

By ECF

Honorable Katherine Polk Failla United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

Re: United States v. Ahuja and Shor, 18 Cr. 328 (KPF)
Defendants' Joint Request for an Order Requiring Disclosure and for a
Hearing on Brady/Giglio Violations

Dear Judge Failla:

We write on behalf of defendants Ahuja and Shor regarding the government's letter to the Court dated June 24, 2020. We believe that the letter—in which the government agrees to take only certain limited steps in response to the issues raised on our letter dated June 19, 2020—raises more questions than it answers. We accordingly request permission to file a reply on or before July 2.

Very truly yours,

Justin S. Weddle